UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS CENTRAL DIVISION

In re:)	
JOHN A. YELLIG, III, & PATRICIA A.)	Case No. 17-41278
YELLIG)	Chapter 13

MOTION TO APPROVE SETTLEMENT

NOW COMES the debtor, John A. Yellig, III, and hereby moves this Honorable Court to approve the proposed settlement of his employment claim on the terms attached as Exhibit A. In support of this motion, the debtor states as follows:

- 1. The debtor has reached a compromise of his claim arising out of the termination of his employment with Veterans Inc. Counsel for Veterans, Inc. has drafted and Plaintiff has executed a settlement agreement contemplating the resolution of this and all other disputes and controversies between the Parties. The settlement agreement acknowledges that Veterans, Inc. disputes liability in this matter and the settlement is not an admission of liability.
- 2. Debtor is represented by special counsel, Alan D. Meyerson, Esq. pursuant to debtor's application to employ, allowed by this Honorable Court on 7/28/2017.
- 3. Debtor has not asserted an exemption in the settlement funds, and the debtor's confirmed Chapter 13 plan provides that the non-exempt funds will be paid to the Trustee.
- All creditors and the Trustee have been notified of the proposed settlement, and a
 certificate of service has been filed. <u>See MLBR 9019-1(d)</u>. <u>See also In re Dooley</u>, 399
 B.R. 340, 349 (Bankr. Mass. 2009).
- 5. The compromise is in the best interests of the estate. See id.

WHEREFORE, for the foregoing reasons, the debtor respectfully requests that this Honorable Court approve the proposed settlement.

PLAINTIFF, JOHN A. YELLIG, III By his attorney,

/s/ William C. Parks
William C. Parks, BBO# 679820
Law Office of William C. Parks
100 State Street, Suite 900
Boston, MA 02109

Certificate of Service

I, William C. Parks, certify that, to the best of my knowledge, this document, filed through the Court's ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on June 21, 2018.

/s/ William C. Parks
William C. Parks